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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

NOV - 6 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Petitions to Waive Payphone) CC Docket No. 96-128
Coding Digit Requirements)

REPLY OF U S WEST, INC.

U S WEST, Inc. ("U S WEST"), through counsel and pursuant to the Federal Communications Commission's ("Commission") Public Notice,¹ hereby files its reply to comments on local exchange carrier ("LEC") petitions for waiver of the payphone coding digit requirements² and AT&T Corp.'s ("AT&T") response³ to the Commission's Waiver Order.⁴ U S WEST is a member of the LEC ANI Coalition and is a beneficiary of the Commission's Waiver Order. U S WEST is also a member of the LEC Payphone Coalition and concurred in the Coalition's comments

¹ Public Notice, Pleading Cycle Established for Petitions to Waive Payphone Coding Digits Requirements, CC Docket No. 96-128, DA 97-2214, rel. Oct. 20, 1997.

² Petition for Waiver of the United States Telephone Association ("USTA"), filed Sep. 30, 1997; TDS Communications Corporation Petition for Waiver, filed Oct. 1, 1997. And see, Letter to John B. Muleta, Common Carrier Bureau, from Michael K. Kellogg, LEC ANI Coalition, dated Sep. 30, 1997.

³ See Letter to John B. Muleta, Common Carrier Bureau, from E. E. Estey, AT&T, dated Oct. 14, 1997.

⁴ In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128, Order, DA 97-2162, rel. Oct. 7, 1997 ("Waiver Order").

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which were filed on October 30, 1997.⁵ U S WEST also filed supplementary comments addressing its particular circumstances which differed from other members of the LEC Payphone Coalition in that U S WEST has installed Originating Line Number Screening ("OLNS") and planned to use it for per-call compensation purposes.⁶ In its comments U S WEST urged the Commission to avoid taking any action on AT&T's request for modification (or waiver) that would prejudice the outcome of any future investigation on the payphone identification requirement or preclude LECs from using OLNS to satisfy this requirement.⁷

The comments of a number of parties indicate that U S WEST is not alone in its decision to employ OLNS for both anti-fraud and per-call compensation purposes.⁸ Should the Commission determine that OLNS is not an acceptable

⁵ U S WEST also concurs in the Reply Comments filed by the LEC Payphone Coalition herein today.

⁶ The Commission's Order in CC Docket No. 91-35 allowed carriers the option of selecting OLNS or Flex ANI to satisfy anti-fraud requirements and indicated that either solution would be sufficient to identify payphones for per-call compensation purposes. U S WEST selected OLNS because it was the most economic means for a company such as U S WEST to satisfy the Commission's anti-fraud requirements. Until recently, U S WEST was of the opinion that OLNS was an acceptable means of identifying payphones for per-call compensation purposes. In the Matter of Policies and Rules Concerning Operator Service Access and Pay Telephone Compensation, Third Report and Order, 11 FCC Rcd. 17021 (1996).

⁷ The Commission's Waiver Order implies that OLNS may not be an acceptable means of satisfying the Commission's requirement to transmit specific ANI digits to identify calls from payphones for per-call compensation purposes. However, the Commission has indicated that it will be investigating the payphone-specific digit requirement further.

⁸ See Comments of The Southern New England Telephone Company, filed Oct. 30, 1997 at 1; Comments of TDS Telecommunications Corporation, filed Oct. 30, 1997 at 2; Comments of the National Exchange Carrier Association, filed Oct. 30, 1997 at 2-3. Also see, USTA Petition at 3, 11.

means of satisfying the requirement to transmit payphone-specific digits for per-call compensation purposes, there is no question that U S WEST will need additional time beyond March 9, 1998 to deploy alternative technology (e.g., Flex ANI). Any requirement to use an alternative other than OLNS would require the installation and turn-up (including required translations work) of new software in over 1,500 U S WEST end offices. This would be a major implementation effort which would stretch far beyond March 9, 1998. As such, the Commission should not be deluded into thinking that a six-month waiver period is sufficient for all LECs if it requires the use of a specific method (e.g., Flex ANI) for identifying payphones for per-call compensation purposes.

MCI Telecommunications Corporation ("MCI") asserts that because U S WEST has an effective Flex ANI tariff on file with the Commission that U S WEST can cost-effectively implement Flex ANI.⁹ MCI is confused. The fact that U S WEST may have an effective tariff for Flex ANI, says nothing about how widespread Flex ANI may be deployed in U S WEST or whether it is cost effective to deploy Flex ANI in all end offices. Currently, Flex ANI is available in four U S WEST central offices. It was installed in response to a specific customer request. No further customer orders have been forthcoming nor have customers shown any interest in purchasing Flex ANI. Under U S WEST's tariff, Flex ANI is available in "suitably equipped" end offices. Contrary to MCI's assertion, Flex ANI capability was not deployed in any other offices because it was not found to be "cost

⁹ Opposition of MCI, filed Oct. 30, 1997 at 7.

effective" -- particularly in light of the lack of demand. The Commission should give no weight to MCI's confused comments on Flex ANI tariffs and "cost effectiveness."

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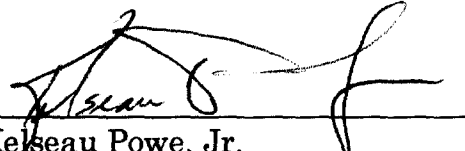
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November 6, 1997

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 6th day of November, 1997,
I have caused a copy of the foregoing **REPLY OF U S WEST, INC.** to be served,
via first-class United States Mail, postage-prepaid, upon the persons listed on the
attached service list.


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